

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-CR- 80219-RLR

UNITED STATES OF AMERICA)
)
v.)
)
MICHAEL GORDON DOULGAS,)
a/k/a "DaddyBreendsFam,")
a/k/a "Michael,")
)
Defendant.)
_____)

**GOVERNMENT'S UNOPPOSED MOTION TO EXTEND DUE DATE
FOR PRETRIAL MOTIONS**

The United States, by and through the undersigned Assistant United States Attorney, hereby respectfully requests this this Honorable Court enter an Order extending the due date for pretrial motions for two weeks until July 19, 2024. Calendar Call is presently set for September 3, 2024 at 1:45 P.M. with trial to begin on September 9, 2024.

Previously, the defendant filed an unopposed motion to extend the pretrial motion deadline from June 14, 2024 to July 5, 2024 (DE 40). The defendant needed to conduct additional discovery to potentially take advantage of the government's opening plea offer. The Court granted the request (DE 41).

On Friday, June 28, 2024, the defendant advised, through counsel, that he would plea to the Indictment. The government provided a plea agreement and factual proffer on Monday July 1, 2024. Yesterday, July 2, 2024, the defendant, through counsel advised he was as of yet not ready to plea guilty.

As the defendant had originally advised he would plea guilty, and has now offered that he is not ready to plea guilty, and deadline for pre-trial motions now 3 days away, the government requests only two additional weeks to file pretrial motions including motions in limine and 404b motions, until July 19, 2024. The government is also now preparing a superseding indictment, as was previously made known to the defendant, and will alter the tenor of said pretrial motions.

The requested July 19, 2024 date for the filings of motions is still more than seven (7) weeks before the trial is scheduled to begin and will provide the parties ample time to file motions, respond to the motions, and if necessary for the Court to have a hearing on the matter.

The undersigned has conferred with defense counsel, John Kirby, who is in agreement, and has no objection, to this request.

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

By: s/Gregory Schiller
Gregory Schiller
Assistant United States Attorney
Florida Bar No. 0648477
500 S. Australian Ave., Suite 400
West Palm Beach, FL 33401
Email: gregory.schiller@usdoj.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 3, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

s/Gregory Schiller
Gregory Schiller
Assistant United States Attorney